

From: Mia, Marcia

Sent: Friday, August 02, 2019 06:18 PM

To: McNeal, Dave

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

## Ex. 5 Deliberative Process (DP)

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: McNeal, Dave <Mcneal.Dave@epa.gov>

Sent: Friday, August 02, 2019 11:39 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Marcia,

Thanks for all the time and effort you are putting into this.

The one pager looks good, and I noticed that you caught a couple of errors in my draft letter -

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I plan to give my management a "heads up" about what's going on since there is a potential

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## Ex. 5 Deliberative Process (DP)

David McNeal

EPA Region 4

404-562-9102

From: Mia, Marcia <Mia.Marcia@epa.gov>  
Sent: Thursday, August 01, 2019 6:00 PM  
To: McNeal, Dave <Mcneal.Dave@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>  
Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Hi Dave,

I put some time into this today. I also wanted to let you know that we are including the issue in our AA level bi-weekly next week,

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consolidated markup to you. Here is the one pager I am using for my AA next week. If I got anything wrong, pls let me know.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: McNeal, Dave <Mcneal.Dave@epa.gov>  
Sent: Wednesday, July 31, 2019 4:24 PM  
To: Marsh, Karen <Marsh.Karen@epa.gov>  
Cc: Mia, Marcia <Mia.Marcia@epa.gov>  
Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

I have attached my draft response request. Comments are appreciated,

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**Ex. 5 Deliberative Process (DP)**

David McNeal

EPA Region 4

404-562-9102

From: McNeal, Dave

ED\_004016\_00080822-00002

Sent: Thursday, July 25, 2019 1:07 PM  
To: Marsh, Karen <Marsh.Karen@epa.gov>  
Cc: Mia, Marcia <Mia.Marcia@epa.gov>  
Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Hi Karen,

Thanks for the quick response. I'll draft a response to **Ex. 5 Deliberative Process (DP)** and send it to you and Marcia by sometime early next week.

David McNeal

EPA Region 4

404-562-9102

From: Marsh, Karen  
Sent: Thursday, July 25, 2019 12:45 PM  
To: McNeal, Dave <Mcneal.Dave@epa.gov>  
Cc: Mia, Marcia <Mia.Marcia@epa.gov>  
Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Hi again Dave,

Based on the information provided (especially the site map), **Ex. 5 Deliberative Process (DP)**

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When Marcia and I spoke earlier, **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

Happy to review any draft responses. Let me know if there's anything else you'd need from me.

Karen

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: McNeal, Dave

Sent: Thursday, July 25, 2019 9:40 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

## Ex. 5 Deliberative Process (DP)

David McNeal

EPA Region 4

404-562-9102

From: McNeal, Dave

Sent: Wednesday, July 24, 2019 2:56 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

Karen,

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# Ex. 5 Deliberative Process (DP)

David McNeal

EPA Region 4

404-562-9102

From: Mia, Marcia

Sent: Thursday, July 18, 2019 11:15 AM

To: McNeal, Dave <Mcneal.Dave@epa.gov>

Cc: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Thanks Dave,

I am cc'ing Karen Marsh - the OAQPS contact for the fugitive portions of NSPS 0000a.

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Regarding the DOR under 60.5416a(b)(10) - that doesn't apply to compressor station fugitive monitoring. But they do have the DOR provisions of 60.5397a(h)(2). That gives them until the next compressor station shutdown or two years.

Marcia B Mia

Air Branch

Office of Compliance

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U.S. Environmental Protection Agency

202-564-7042

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From: McNeal, Dave

Sent: Thursday, July 18, 2019 10:37 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Marcia,

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## Ex. 5 Deliberative Process (DP)

Under provisions in 60 CFR 60.5416(b)(10) source owners/operators can delay the repair of a leaking component if the repair is technically infeasible without a shutdown, or if emissions resulting from an immediate repair would be greater than the fugitive emissions likely to result from a delay of the repair. Under these provisions, the repair of leaking equipment must be completed by the end of the next shutdown.

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David McNeal

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